

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Tamara Dionne Beacham, Debtor**

**Case No. 24-01458-JAW  
CHAPTER 13**

**RESPONSE**

COMES NOW, Debtor, by and through counsel, and responds to Creditor, 21<sup>st</sup> Mortgage Corporation's Motion for Relief from Stay and for Other Relief (DK #49) as follows:

1. Debtor commenced this case on 06/24/2024 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor was unable to make plan payments due to a temporary loss of employment caused by health issues.
3. Debtor has since returned to work and is now able to resume making regular plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.  
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was filed on CM/ECF this day and that the following are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

Edward E. Lawler, Jr. on behalf of Creditor 21st Mortgage Corporation

Harold Barkley

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.